

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SOUND AROUND, INC.,	X	
	:	
	:	
Plaintiff,	:	Case No.: 1:24-cv-01986
	:	
v.	:	
	:	
MOISES FRIEDMAN, SHULIM ELIEZER	:	<b>NOTICE OF DEFENDANTS’</b>
ILOWITZ, ML IMPORTS, INC., CYRF, INC.,	:	<b>MOTION IN LIMINE</b>
LRI GROUP, LLC, EXECUTIVE SERVICES,	:	<b>TO EXCLUDE PLAINTIFF’S</b>
EXECUTIVE LAUNDRY, LLC, MDF	:	<b>DECLARATIONS AND</b>
MARKETING, INC., WORLD GROUP	:	<b><u>EXHIBITS</u></b>
IMPORT, LLC, HEFEI PAIDONG OUTDOOR	:	
PRODUCTS CO., LTD.,	:	
	:	
Defendants.	:	
	X	

**PLEASE TAKE NOTICE** that the undersigned attorneys for Defendants MOISES FRIEDMAN, SHULIM ELIEZER ILOWITZ, ML IMPORTS, INC., CYRF, INC., LRI GROUP LLC, MDF MARKETING, INC., and WORLD GROUP IMPORT, LLC (collectively, the “Defendants”) will move before the Hon. Honorable Denise L. Cote, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York as soon as this matter may be heard, for an Order, in limine, excluding pursuant Federal Rules of Evidence 801-803, 602 and 901, the declarations of Abraham Brach and Jeremiah Brach, and all exhibits annexed thereto, served by Plaintiff SOUND AROUND, INC. together with such other relief as this Court deems equitable and just.

**PLEASE TAKE FURTHER NOTICE** that, in support of this motion, Defendants will rely on the accompanying Declaration of Nicholas Fortuna, Esq., and all exhibits annexed thereto, and the accompanying Memorandum of Law.

Dated: July 21, 2025

ALLYN & FORTUNA LLP

By: s/Nicholas Fortuna  
Nicholas Fortuna  
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